LEWIS, D'AMATO, BRISBOIS & BISGAARD LLP

LOS ANGELES OFFICE BUITE 1200

221 NORTH FIGUEROA STREET LOB ANGELES, CALIFORNIA 80012-2601 TELEPHONE (213) 250-1600

SAN DIEGO OFFICE
SUITE BOO
BBO WEST 'C' STREET
SAN DIEGO, CALIFORNIA 92101-3540
TELEPHONE (519) 233-1006

BAN FRANCISCO DEFICE GUITE 1400
ONE SANSOME STREET
SAN FRANCISCO, CALIFORNIA 94104-4448
TELEPHONE (415) 382-2880

> STEPHEN T. WAIMEY DIRECT DIAL: (714) 888-6581 E-MAIL: WAIMEY@LDEB.COM

LAWYERS **SUITE 1400**

650 TOWN CENTER DRIVE CENTER TOWER BUILDING

COSTA MESA, CALIFORNIA 92826-1925 TELEPHONE (714) 546-8200 WWW.LDGB.COM

INLAND EMPIRE OFFICE TRI-CITY CORPORATE CENTRE GUITE GOD GEO EAST HOSPITALITY LANE SAN BERNARDINO, CAUPORNIA 82406-3508

8ACRAMENTO OFFICE BUITE 200 2500 VENTURE OAKS WAY SACRAMENTO, CALIFORNIA 96833-9500 TELEPHONE (916) 564-5400

TELEPHONE (909) 387-1130

PACSIMILES: LOS ANGELES: (213) 250-7900 SAN DIEGO: (818) 233-8927 COGTA MESA: (714) 880-1030 SAN FRANCISCO: (418) 434-082 SAN BERNARDINO; (909) 387-1186 SACRAMENTO; (916) 564-5444

OUR FILE NO. 21762-142

October 27, 2000

BY FACSIMILE

Scott B. York Vehicle Integrity Division Office of Defects Investigation National Highway Traffic Safety Administration 400 Seventh Street, S.W. Room 5326 NSA-12 Washington, D.C. 20590

000-175

Sephia ORVR Valve Replacement Re:

Dear Scotty:

Thanks for tracking down the final changes to the customer letter. I am glad that this letter has been a product of joint NHTSA and EPA efforts, so that there is no doubt about the resulting response rate.

Please note that the recall will now immediately be implemented. The relevant mailing dates will be:

> Regions 10/27/00 Dealers 11/3/00 11/13/00 Owners:

Please let me know if you have any other concerns.

Best/regards

Stechen T. Waimev

WIS, D'AMATO, BRISBOIS & BISGAARD LL

STW

Jonathon White - Via Fax CC:

Steve Albrink (EPA) Tom Ball (EPA)

CM2DG0:21403.1

Voluntary Emissions Recall Report 1998 – 1999 Kla Sephia

This document is provided pursuant to the form designated by 40 CFR Part 85.1904 and reports details related to an emissions service campaign relating to 1998 - 1999 Kia Sephia passenger cars. The responses below pertain to sections (a)(1)-(a)(11) of the above referenced regulation.

(1) Description of each class or category of vehicle or engine recalled including the number of vehicles to be recalled, the model year, the make, the model, and such other information as may be required to identify the vehicles or engines recalled.

All 1998 and 1999 model year Kie Sephia as indicated below:

Engine Family	Model Year	Make	Model	No. Vehicles
WKMXVOL8A01	1998	Kla	Sephia	43,040 (39910 Federal
İ		l .	l _ `	3130 California)
XXMXVOI.8A02	1999	Kla	Sephia	57,097 (52495 Federal
			ļ <u></u>	4602 California)

(2) Description of specific modifications, atterations, repairs, corrections, adjustments, or other changes to be made to correct the vehicles or endines affected by the emission related defect.

Since there is no practical way to determine which vehicles have properly functioning ORVR valves, the ORVR valves in all designated vahicles will be offered for replacement.

(3) Description of method by which the manufacturer will determine the names and addresses of vehicle or engine owners and the method by which they will be notified.

Letters will be sent via First Class U.S. Mail to notify owners. The list will be obtained from an independent service that will develop the database from state DMV ownership records.

(4) Description of proper maintenance or use, if any, upon which the manufacturer conditions eligibility for repair under the remedial plan, an explanation of the manufacturer's reasons for imposing any such condition, and a description of the proof to be required of a vehicle or angine owner to demonstrate compliance with any such condition.

There will be no restrictions on eligibility.

(5) Description of the procedure to be followed by vehicle or engine owners to obtain correction of the nonconformity. This shall include designation of the date on or after which the owner can have the nonconformity remedied, the time reasonably necessary to perform the labor to remedy the defect, and the designation of facilities at which the defect can be remedied.

Owners will be instructed to contact any authorized Kie dealer to schedule an appointment for the repair. Dealer notification will be provided in late July and customer notification will begin in early August once adequate supplies of parts are received from TI Automotive Group. EPA will be notified of the exect date owner letters will be sent as soon as possible. The repair will take approximately two hours to complete.

(6) If some or all of nonconforming vehicles or engines are to be remedied by persons other than dealers or authorized warranty agents of the manufacturer, who will remedy the defect.

Not applicable.

(7) Three copies of the letters of notification to be sent to vehicle or engine owners.

Copies of these letters will be submitted no later than July 10, 2000.

(8) Description of the system by which the manufacturer will assure that an adequate supply of parts will be available to perform the repair under the remedial plan including the date by which an adequate supply of parts will be available to initiate the repair campaign, the percentage of the total parts requirement of each person who is to perform the repair under the remedial plan to be shipped to initiate the campaign, and the method to be used to assure the supply remains both adequate and responsive to owner demand.

Based upon prior discussions with Ti Automotive regarding their ability to manufacture and inspect parts, Kie enticipates that Ti Automotive will deliver adequate parts by July 31, 2000 for Kie to initiate the campaign. Kie will thereafter meet dealer parts orders using normal ordering procedures.

(9) Three copies of all necessary instructions to be sent to those persons who are to perform the repair under the remedial plan.

Copies of the applicable TSB will be submitted no later than July 10, 2000.

(10) Description of the impact of the proposed changes on fuel consumption, driveability, and safety of each class or category of vehicles or engines to be recalled.

The repair decided on by Kie will not cause any adverse impact to fuel consumption, drivesbility or safety.